

1 Matthew I. Knepper, Esq.
2 Nevada Bar No. 12796
3 Miles N. Clark, Esq.
4 Nevada Bar No. 13848
5 KNEPPER & CLARK LLC
6 10040 W. Cheyenne Ave., Suite 170-109
7 Las Vegas, NV 89129
8 Phone: (702) 825-6060
9 Fax: (702) 447-8048
10 Email: matthew.knepper@knepperclark.com
11 Email: miles.clark@knepperclark.com

12 David H. Krieger, Esq.
13 Nevada Bar No. 9086
14 George Haines, Esq.
15 Nevada Bar No. 9411
16 Shawn W. Miller, Esq.
17 Nevada Bar No. 7825
HAINES & KRIEGER, LLC
8985 S. Eastern Ave., Suite 350
Henderson, NV 89123
Phone: (702) 880-5554
Fax: (702) 385-5518
Email: dkrieger@hainesandkrieger.com
Email: ghaines@hainesandkrieger.com
Email: smiller@hainesandkrieger.com
Attorneys for Plaintiff

18 **UNITED STATES DISTRICT COURT**
19 **DISTRICT OF NEVADA**

20 JASON KIBBEE,

21 Plaintiffs,

22 vs.

23 SMITH-PALLUCK ASSOCIATES CORP.,
24 doing business as LAS VEGAS ATHLETIC
CLUBS,

25 Defendant.

Case No.: 2:18-cv-01848-APG-GWF

**STIPULATION AND ORDER TO
EXTEND BRIEFING DEADLINES
REGARDING MOTION TO STAY
DISCOVERY AND HEARING DATE
[FIRST REQUEST]**

1 Plaintiff Jason Kibbee (“Plaintiff”), by and through his counsel of record, and Defendant
2 Smith-Palluck Associates Corp., doing business as Las Vegas Athletic Clubs (“LVAC”) have
3 agreed and stipulated to the following:
4

5 1. On November 16, 2018, LVAC filed a *Motion to Stay Discovery* (the “Motion”)
6 [ECF Dkt.8].

7 2. Plaintiff’s Response is due November 30, 2018. LVAC’s Reply in Support of the
8 Motion would thereafter be due December 7, 2018.

9 3. The Court scheduled a hearing on the Motion on December 14, 2018.
10

11 4. Plaintiff and LVAC have agreed to extend Plaintiff’s response ten days in order to
12 allow Plaintiff’s counsel to contact the clients to address LVAC’s pending Motion and obtain
13 approval to file the response and to continue the hearing. Plaintiff and LVAC have also agreed to
14 extend LVAC’s reply ten days to account for the holiday season. As a result, both Plaintiff and
15 LVAC hereby request this Court to further extend the date for Plaintiff to respond to LVAC’s
16 Motion until **December 10, 2018**, LVAC’s Reply in Support of its Motion until **December 27,
17 2018**, and to continue the hearing to **January 14, 15, 16, or 17**. This stipulation is made in good
18

19 //

20 //

21 //

22 //

23 //

24 //

25 //

26 //

27 //

28 STIPULATION AND ORDER TO EXTEND BRIEFING DEADLINES REGARDING MOTION TO STAY
DISCOVERY AND HEARING DATE [FIRST REQUEST] - 2

1 faith, is not interposed for delay, and is not filed for an improper purpose.

2 IT IS SO STIPULATED.

3 Dated November 28, 2018.

5 <i>/s/ Miles N. Clark</i>	5 <i>/s/ Joel E. Tasca</i>
6 Matthew I. Knepper, Esq.	6 Joel E. Tasca, Esq.
7 Nevada Bar No. 12796	7 Nevada Bar No. 14124
8 Miles N. Clark, Esq.	8 Lindsay C. Demaree, Esq.
9 Nevada Bar No. 13848	9 Nevada Bar No. 11949
10 KNEPPER & CLARK LLC	10 Stacy H. Rubin, Esq.
11 10040 W. Cheyenne Ave., Suite 170-109	11 Nevada Bar No. 9298
12 Las Vegas, NV 89129	12 BALLARD SPAHR LLP
13 David H. Krieger, Esq.	13 1980 Festival Plaza Drive, Suite 900
14 Nevada Bar No. 9086	14 Las Vegas, Nevada 89135
15 HAINES & KRIEGER, LLC	15 Telephone: (702) 471-7000
16 8985 S. Eastern Avenue, Suite 350	16 Facsimile: (702) 471-7070
17 Henderson, Nevada 89123	17 tasca@ballardspahr.com
18 <i>Attorneys for Plaintiffs</i>	18 demareel@ballardspahr.com
19	19 rubins@ballardspahr.com
20	20 <i>Attorneys for Defendant</i>
21	21 <i>Smith-Palluck Associates Corp., doing</i>
22	22 <i>business as Las Vegas Athletic Clubs</i>

16 *Kibbee v. Smith-Palluck Associates Corp.*
17 2:18-cv-01848-APG-GWF

18 **ORDER GRANTING**
19 **STIPULATION TO EXTEND BRIEFING DEADLINES REGARDING MOTION TO**
20 **STAY DISCOVERY AND HEARING DATE**

21 **IT IS SO ORDERED.**

22 
23

UNITED STATES MAGISTRATE JUDGE

24 Dated: 11/29/2018